

*** Filed ***
09:34 AM, 24 Sep, 2025
U.S.D.C., Eastern District of New York

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
CHARLES SALDARRIAGA,

Plaintiff,

25-CV-01115 (RPK) (JRC)

- against -

**FIRST AMENDED
COMPLAINT**

THE CITY OF NEW YORK, Sergeant WILLIAM J.
PLANETA (Shield No. 2571), Detective ERIC BOLGER
(Shield No. 680), Detective LEONARDO MOSCOSO
(Shield No. 5917), and Police Officer MOHAMMAD F.
HOSSAIN (Shield No. 17007),

JURY TRIAL
DEMANDED

Defendants.
-----X

Plaintiff, CHARLES SALDARRIAGA, proceeding *pro se*, hereby files this Complaint against Defendants, the City of New York (the “City”), Sergeant William J. Planeta (“Sgt. Planeta”), Detective Eric Bolger (“Det. Bolger”), Detective Leonardo Moscoso (“Det. Moscoso”), and Police Officer Mohammad F. Hossain (“P.O. Hossain”) (collectively “Defendants”), and alleges as follows:

NATURE OF THE ACTION

1. This is a civil rights action under 42 U.S.C. § 1983 arising from a March 27–28, 2024 stop, arrest, detention, prosecution, and vehicle seizure in Queens, New York. Plaintiff asserts violations of the Fourth and Fourteenth Amendments for false arrest, malicious prosecution, denial of a fair trial (fabrication/suppression), unreasonable seizure of property, failure to intervene, and municipal liability (Monell).

JURISDICTION AND VENUE

2. Jurisdiction is conferred upon this Court under 28 U.S.C. §§ 1331 and 1343, as this action seeks redress for the violation of Plaintiff’s constitutional and civil rights.

3. Venue is proper in this District under 28 U.S.C. § 1391(b) and (c) because the events giving rise to this action occurred in Queens, New York, within the jurisdiction of the Eastern District of New York. Additionally, Plaintiff resides in Queens, New York, further establishing proper venue in this District.

PARTIES

A. Plaintiff Charles Saldarriaga

4. Charles Saldarriaga is a United States citizen who resides in Queens County, New York.

5. He brings this action under 42 U.S.C. § 1983 for violations of his Fourth and Fourteenth Amendment rights arising from a March 27–28, 2024 stop, arrest, detention, prosecution, and vehicle seizure in Queens.

6. As a result of the conduct alleged herein, Plaintiff suffered loss of liberty, emotional distress, financial harm (including reasonable criminal-defense expenses), a stress-induced medical episode requiring hospital evaluation while in custody, and property damage/loss of use of a vehicle.

B. Defendant City of New York (“City”)

7. The City of New York (the “City”) is a municipal corporation organized under the laws of the State of New York.

8. The City acts through the New York City Police Department (NYPD) and is responsible for the policies, practices, training, supervision, and discipline of NYPD personnel.

9. As alleged in the Monell claim below, the constitutional violations at issue were caused by City policies/customs and/or deliberate indifference in training and supervision concerning: (a) pre-arrest DMV/e-Justice verification for suspected forged/counterfeit plates; (b) complete and accurate transmission of inculpatory and exculpatory information to prosecutors, and withdrawal/correction of accusatory paperwork when exculpatory confirmations exist; and (c) standardized, least-intrusive vehicle-impound procedures, including when to tow rather than allow personal officer driving.

10. Upon information and belief, prior lawsuits/complaints and internal data placed the City on notice of risks pertinent to these training/supervision areas. See Monell allegations, *infra*.

C. Defendant Sergeant William J. Planeta (“Sgt. Planeta”)

11. Sergeant William J. Planeta was, at all relevant times, an NYPD sergeant acting under color of state law and within the scope of his employment. He is sued in his individual capacity.

12. On March 27, 2024, while in plainclothes and without visible NYPD insignia/body-worn camera, Sgt. Planeta initiated Plaintiff’s detention near 28-31 Steinway Street, ordered Plaintiff from the vehicle, placed him in handcuffs, and directed his transport to the 114th Precinct without a warrant and without articulating a lawful basis.

13. After Plaintiff was handcuffed, Sgt. Planeta personally entered and drove the vehicle from the scene to the precinct rather than arranging a tow pursuant to standardized procedures or permitting prompt third-party retrieval.

D. Defendant Detective Eric Bolger (“Det. Bolger”)

14. Detective Eric Bolger was, at all relevant times, an NYPD detective acting under color of state law and within the scope of his employment. He is sued in his individual capacity.

15. Det. Bolger was not present at the roadside stop or arrest. He later encountered Plaintiff at the 114th Precinct, identified himself as an arresting officer, questioned Plaintiff, and prepared and/or forwarded accusatory paperwork to prosecutors, thereby personally participating in the continuation of Plaintiff's confinement and the initiation/continuation of criminal charges.

16. Upon information and belief, Det. Bolger reviewed or had access to DMV/e-Justice confirmation of plate validity prior to or during the forwarding/maintenance of accusatory information, yet proceeded without correction; further particulars are pleaded in the malicious-prosecution and fair-trial (fabrication/omission) counts.

E. Defendant Detective Leonardo Moscoso ("Det. Moscoso")

17. Detective Leonardo Moscoso was, at all relevant times, an NYPD detective acting under color of state law and within the scope of his employment. He is sued in his individual capacity.

18. Det. Moscoso arrived on scene after Plaintiff requested uniformed officers. In his presence, Sgt. Planeta ordered Plaintiff from the vehicle, placed him in handcuffs, and caused the arrest and vehicle seizure without probable cause.

19. Det. Moscoso had a realistic opportunity to intervene (including by performing an immediate DMV/e-Justice verification, objecting to the arrest, and ensuring a standardized impound rather than personal officer driving) but failed to do so.

F. Defendant Police Officer Mohammad F. Hossain ("P.O. Hossain")

20. Police Officer Mohammad F. Hossain was, at all relevant times, an NYPD police officer acting under color of state law and within the scope of his employment. He is sued in his individual capacity.

21. P.O. Hossain arrived on scene after Plaintiff requested uniformed officers. In his presence, Sgt. Planeta ordered Plaintiff from the vehicle, placed him in handcuffs, and caused the arrest and vehicle seizure without probable cause.

22. P.O. Hossain had a realistic opportunity to intervene (including by performing an immediate DMV/e-Justice verification, objecting to the arrest, and ensuring a standardized impound rather than personal officer driving) but failed to do so.

FACTUAL ALLEGATIONS

23. On or about March 27, 2024, at approximately 1:45 p.m., Plaintiff was at or near 28-31 Steinway Street, Astoria, Queens.

24. An unmarked vehicle pulled in behind Plaintiff and activated flashing red and white lights. Sgt. William J. Planeta, in plain clothes and with no visible NYPD insignia or body-worn camera, approached Plaintiff's driver's-side window.

25. Without identifying a lawful basis for a stop, Sgt. Planeta requested driver's license, registration, and proof of insurance. Plaintiff complied.

26. Concerned for his safety and uncertain of the officer's identity, Plaintiff called 911 at least seven (7) times to request uniformed officers to verify the encounter. **(See Ex. A, 911 Report.)**

27. Uniformed NYPD officers, including Det. Moscoso and P.O. Hossain, arrived shortly thereafter.

28. In their presence, and without articulating a lawful basis, Sgt. Planeta ordered Plaintiff to exit the vehicle, placed him in handcuffs, and directed that he be transported to the 114th Precinct. No warrant was presented, and no charge was stated at the scene.

29. No Vehicle and Traffic Law summons was issued to Plaintiff. The subsequent Criminal Complaint charged only Penal Law § 170.20 (alleged “counterfeit plates”) and did not cite any traffic offense as a basis for the stop or arrest. **(See Ex. B, Criminal Complaint.)**

30. At the time of the stop and arrest, the vehicle’s license plates, registration, inspection, and insurance were valid and active, as reflected in DMV records readily accessible to officers via terminal systems. **(See Ex. C, e-Justice Report.)**

31. No officer at the scene identified any traffic offense, and, upon information and belief, officers did not conduct a DMV terminal verification before arresting Plaintiff.

32. Plaintiff did not learn of any allegation regarding the plates until after he was arrested.

33. After handcuffing Plaintiff, Sgt. Planeta personally entered and drove the vehicle from the scene to the precinct rather than arranging a tow or permitting retrieval by a licensed third party.

34. At the 114th Precinct, Plaintiff remained in custody for several hours.

35. Det. Bolger was not present at the roadside stop or arrest and did not witness any conduct preceding Plaintiff’s seizure.

36. Hours later at the precinct, Det. Bolger identified himself as an arresting officer, questioned Plaintiff, and prepared and/or forwarded the accusatory instrument and related arrest paperwork to prosecutors.

37. When precinct personnel did not transport Plaintiff to central booking, Sgt. Planeta personally transported Plaintiff in an unmarked vehicle to central booking.

38. While in central booking and still in NYPD custody, Plaintiff experienced palpitations and shortness of breath, was transported to Mount Sinai Hospital for EKG and bloodwork, was medically cleared, and returned to custody.

39. On or about March 28, 2024, Plaintiff was arraigned in Queens Criminal Court on Criminal Possession of a Forged Instrument in the Third Degree (N.Y. Penal Law § 170.20) based on an allegation that his license plates were “counterfeit.”

40. Following arraignment, Plaintiff was required to make court appearances and comply with release conditions until the case was dismissed.

41. Before continued prosecution, after learning of the plate allegation, Plaintiff’s defense counsel provided DMV confirmations to the District Attorney; upon information and belief, Defendants reviewed or had access to the same DMV confirmations via terminal checks and/or the case file. **(See Ex. D, DMV Receipt.)**

42. Any items noted during a post-arrest inventory at the precinct were documented after Plaintiff had been handcuffed and the vehicle removed from the scene.

43. Plaintiff was in NYPD custody for approximately twenty-eight (28) hours from arrest through arraignment. **(See Ex. E, Arraignment Report.)**

44. On or about July 16, 2024, the criminal case was dismissed and sealed in Plaintiff’s favor pursuant to CPL § 30.30; no conviction resulted. **(See Ex. F, Certificate of Disposition.)**

45. Upon release, Plaintiff discovered substantial damage to the vehicle while it was in NYPD custody, and experienced loss of access and use during the impound period.

46. Plaintiff attempted to file a property-damage report at the 114th Precinct and later at the 33rd Precinct, but he was directed elsewhere and was not provided an NYPD complaint report.

47. Plaintiff incurred criminal-defense expenses, vehicle repair costs, and other out-of-pocket losses, and suffered emotional distress, including anxiety and sleep disturbance, as a result of the stop, arrest, prosecution, and vehicle seizure.

CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION

False Arrest and Unlawful Detention Under 42 U.S.C. § 1983 *(Against Sgt. Planeta and Det. Bolger, in their individual capacities)*

48. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

49. Defendants caused Plaintiff to be seized and arrested without a warrant and without probable cause.

50. At the scene, no Vehicle and Traffic Law summons was issued, and the later Criminal Complaint charged only N.Y. Penal Law § 170.20 (alleged “counterfeit plates”). It did not cite any traffic offense as a basis for the stop or arrest. **(See Ex. B.)**

51. At the time of arrest, DMV/e-Justice data reflected that the plates, registration, inspection, and insurance were valid and active. That information was readily available via routine terminal checks; upon information and belief, officers did not perform or heed such checks before arresting Plaintiff. **(See Ex. C; Ex. D.)**

52. Probable cause is judged at the time of arrest; items first observed or inventoried after the arrest cannot retroactively supply probable cause.

53. Det. Bolger, though not present at the stop, personally participated in the continuation of Plaintiff's confinement by identifying himself as an arresting officer, questioning Plaintiff while in custody, and preparing/forwarding accusatory paperwork without resolving plate status via routine verification.

54. Plaintiff suffered a loss of liberty, emotional distress, financial losses (including reasonable criminal-defense expenses), and a stress-related medical episode.

55. Because these facts violated a clearly established right to be free from arrest without probable cause, qualified immunity does not apply at this stage.

SECOND CAUSE OF ACTION

Fourth Amendment: Malicious Prosecution Under 42 U.S.C. § 1983 *(Against Sgt. Planeta and Det. Bolger, in their individual capacities)*

56. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

57. Defendants initiated and/or continued a criminal proceeding; it terminated in Plaintiff's favor; it was without probable cause; Defendants acted with malice; and Plaintiff suffered post-arraignment liberty restraints.

58. Lack of probable cause: The accusatory submission alleged "counterfeit plates," yet DMV/e-Justice records showed the plates were lawful and active and were reasonably available to officers before and during charging; the charging instrument cites no traffic offense.
(Ex. B–D.)

59. Dissipation: Even if arguable cause were assumed initially, it dissipated before continuation when defense counsel furnished DMV confirmations to the District Attorney and those confirmations were available to Defendants through terminal systems and/or the case file, yet prosecution persisted.

60. Malice may be inferred from the absence of probable cause and from Defendants' reckless disregard of readily available exculpatory DMV confirmations.

61. Plaintiff incurred defense expenses, emotional distress, and other damages.

62. Proceeding in the face of exculpatory DMV confirmations violated clearly established law; qualified immunity does not apply at this stage.

THIRD CAUSE OF ACTION
Fourteenth Amendment: Denial of Right to a Fair Trial (Fabrication / Suppression)
Under 42 U.S.C. § 1983
(Against Sgt. Planeta and Det. Bolger, in their individual capacities)

63. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

64. Defendants knowingly or recklessly conveyed that the plates were "counterfeit" based on subjective appearance while omitting readily available DMV/e-Justice confirmations demonstrating validity, and forwarded accusatory information to prosecutors. **(Ex. B–D.)**

65. These fabrications/omissions were material, were likely to influence prosecutorial decisions, and did so, causing a deprivation of liberty including post-arraignment restraints.

66. Plaintiff suffered damages, including liberty restraints, defense expenses, and emotional distress.

67. Fabricating or omitting material facts provided to prosecutors violates clearly established law; qualified immunity does not apply at this stage.

FOURTH CAUSE OF ACTION
Unlawful Seizure of Property Under 42 U.S.C. § 1983
(Against Sgt. Planeta, in his individual capacity)

68. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

69. After handcuffing Plaintiff, Sgt. Planeta personally entered and drove the vehicle from the scene to the precinct rather than employing standardized, least-intrusive impound procedures (e.g., tow to a secured lot with inventory) or permitting prompt third-party retrieval, although the vehicle posed no hazard.

70. The seizure and handling were more intrusive than necessary and unrelated to any legitimate caretaking need; while in NYPD custody, the vehicle sustained damage, and Plaintiff suffered loss of use.

71. Plaintiff suffered property and consequential damages.

72. The unreasonable impound and non-standard handling of Plaintiff's vehicle violated clearly established law; qualified immunity does not apply at this stage.

FIFTH CAUSE OF ACTION

Failure to Intervene Under 42 U.S.C. § 1983

(Against Det. Moscoso and P.O. Hossain, in their individual capacities)

73. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

74. In their presence, Sgt. Planeta ordered Plaintiff from the vehicle, handcuffed him, and caused arrest and vehicle seizure without probable cause.

75. Det. Moscoso and P.O. Hossain had a realistic opportunity to intervene including by performing an immediate DMV/e-Justice verification, objecting to the arrest, and ensuring a standardized impound rather than personal officer driving, but failed to act.

76. Their inaction proximately caused Plaintiff's injuries.

77. Because the underlying violations were clearly established and these officers had a realistic opportunity to act, qualified immunity does not apply at this stage.

SIXTH CAUSE OF ACTION
Municipal Liability (Monell) Under 42 U.S.C. § 1983
(Against Defendant City of New York)

78. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

79. The constitutional violations were caused by the City's policies, customs, and/or deliberate indifference in training and supervision, including:

- a. Pre-arrest verification for alleged counterfeit/forged plates requiring objective DMV/terminal checks rather than subjective "appearance";
- b. Protocols ensuring complete and accurate transmission of inculpatory and exculpatory information to prosecutors and the withdrawal/correction of accusatory paperwork when exculpatory confirmations exist; and
- c. Standardized, least-intrusive vehicle-impound procedures that do not involve personal officer driving absent exigency, with documentation and inventory controls.

80. **Notice:** On information and belief, before March 2024 the City had or should have had notice of the above risks through prior lawsuits/complaints and internal arrest/declination data concerning Penal Law § 170.20 arrests premised on "appearance" without DMV verification; notwithstanding such notice, the City failed to implement adequate corrective training and supervision. *(Plaintiff reserves the right to identify specific matters after initial disclosures.)*

81. In the alternative, to the extent written NYPD policies already require these safeguards, the City was deliberately indifferent in failing to train, supervise, and enforce them.

82. The City's failures were the moving force behind the constitutional injuries alleged.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Charles Saldarriaga respectfully requests that this Court enter judgment in his favor and against Defendants, and grant the following relief:

A. Compensatory Damages in an amount to be determined at trial, including but not limited to:

1. Economic/special damages: (i) lost income or other pecuniary losses caused by the arrest, detention, and prosecution; (ii) reasonable criminal-defense expenses incurred to oppose the baseless charge; (iii) medical expenses related to the custody-induced episode (including hospital evaluation, EKG, bloodwork); (iv) property damage to the vehicle while in NYPD custody and diminution/loss of use; and (v) reasonable substitute transportation costs while deprived of the vehicle.

2. Non-economic/general damages: pain and suffering; emotional distress, anxiety, and humiliation; and loss of enjoyment of life arising from the unlawful seizure, arrest, detention, prosecution, and vehicle seizure.

B. Nominal Damages (in the alternative), in an amount not less than \$1.00 per constitutional violation, should compensatory damages not be awarded.

C. Punitive Damages against the individual defendants only, Sgt. Planeta, Det. Bolger, Det. Moscoso, and P.O. Hossain, for their intentional or reckless violations of

Plaintiff's constitutional rights; no punitive damages are sought against the City of New York.

D. Costs and Disbursements of this action pursuant to Fed. R. Civ. P. 54(d) and 28 U.S.C. § 1920.

E. Prejudgment and post-judgment interest as allowed by law.

F. Such other and further relief as the Court deems just and proper.

G. Reservation of fees: Should counsel appear for Plaintiff in this action, Plaintiff reserves the right to seek reasonable attorney's fees under 42 U.S.C. § 1988.

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues so triable.

RESERVATION OF RIGHTS

Plaintiff reserves the right to amend this Complaint as additional facts and evidence become available during Plaintiff's investigation and discovery, or to assert any additional claims for relief against Defendants or other parties as may be warranted under the circumstances and as allowed by law.

Dated: Queens, New York
September 24, 2025

Respectfully submitted,

/s/ Charles Saldarriaga

Charles Saldarriaga
Pro Se Plaintiff
1-20 Astoria Blvd Apt 4H
Astoria, New York 11102
(929) 789-2220
Charlesny09@yahoo.com

*** Filed ***
09:34 AM, 24 Sep, 2025
U.S.D.C., Eastern District of New York

Exhibit A

911 Report

Executed: 3/27/2024 15:48

Executed by: NYPDFINEST
PLANETA

New York City Police Department 911



Job Number:	24032711945	Date:	3/27/2024	Priority:	2
Occurrence Precinct:	114	Assigned Precinct:	114		
Create Time:	13:48	Disposition Time:	3/27/2024 15:23		

Address

Street Number:	28-19	Apartment:		Place:	
Street Name:	STEINWAY ST	Cross Street:	28 AVE	Intersecting Street:	30 AVE

Narrative

{03/27/2024 13:48:36} ** LOI search completed at 03/27/24 13:48:36

{03/27/2024 13:59:46} Routes D from incident 24032712110 cancelled and duplicated to D24032711945.

{03/27/2024 13:59:47} Duplicate Event: Location = 28-18 STEINWAY ST QN, Cross Street 1 = 28 AVE, Cross Street 2 = 30 AVE, Type = 10P2 INVESTIGATE/POSSIBLE CRIME: SUSP PERSON/OUTSIDE (PROWLER), Subtype = default, Caller Name = WIRELESS-VERIZON(COMTECH), Caller Ph Number = [REDACTED] 2220, Caller Address = LL(-73:54:51.2029,40:45:53.6543): EST 28-74 STEINWAY ST QN, Call Source = ANI/ALI

{03/27/2024 13:59:47} 13:56:42 - ps1-c040 - MC STS STOPPED BY RANDOM VEH ---POSS SOMEONE IMPERSONATING OFFICER

{03/27/2024 13:59:47} 13:56:43 - loi-search - ** LOI search completed at 03/27/24 13:56:43

{03/27/2024 13:59:47} 13:56:49 - ps1-d32 - Event D24032712110 has been displayed by the covering dispatcher

{03/27/2024 13:59:47} 13:56:49 - ps1-d32 - ** >>>> by: 370970 at 03/27/24 13:56:49 on terminal: ps1-d32

{03/27/2024 13:59:47} 13:57:28 - ps1-c040 - MC STS THEY DID NOT IDENTIFY THEMSELF ---NO PARTNER ---IN UNMARKED PERSONAL CAR

{03/27/2024 13:59:47} 13:58:34 - ps1-c040 - ---MW--GLASSES ---5'10 FT ---BLK EQUINOX NY LIC PLT ---[REDACTED] 9-5-5-6

{03/27/2024 13:59:47} 13:59:08 - ps1-c040 - MC SALTARAGA CB [REDACTED] 2220

{03/27/2024 13:59:47} 13:59:20 - ps1-c040 - ANI-ALI [REDACTED] 2220 WIRELESS-VERIZON COMTECH 42-13 28TH AVE NW SECTOR ASTORIA COS:WPH2 LAT: 040.764904 LON:-073.914223 OPER Hall, Kiana E-C-MTPPDVCP300-136

{03/27/2024 13:59:47} 13:59:30 - ps1-d32 - XMITTED-----D1770

{03/27/2024 13:59:47} 13:59:39 - ps1-d32 - 114A2-2 -- Event D24032712110 Dispatch Assigned

{03/27/2024 13:59:47} End of Nearby Duplicate Event data

{03/27/2024 13:59:47} ** Cross Referenced to Event # D24032712110 at: 03/27/24 13:59:47

{03/27/2024 13:59:47} ** >>>> by: SEAN F. GALLAGHER on terminal: ps1-d32

{03/27/2024 14:00:05} DBST1 --JOBS ONE AND THE SAME---JOB IN REGARDS TO VEH STOP--AWAITING UNIT---D1770

Details

Current Radio Code:	68U2 - SEE COMPLAINANT: 85 - MOS/OUTSIDE	Orig. Radio Code:	68U2 - SEE COMPLAINANT: 85 - MOS/OUTSIDE
Resource Count:	2	HSE Property Indicator:	N
Caller Name:		Transit Indicator:	N
Caller Address:		Caller City:	
Comment:			

Resources

Time	Agency	Resource
	PATROL (D)	114A2-2
	PATROL (D)	DBST1

Dispositions

Time	Agency	Disposition	Resource	Active
3/27/2024 15:23:32	PATROL (D)	10-92C	DBST1	Y

*** Filed ***
09:35 AM, 24 Sep, 2025
U.S.D.C., Eastern District of New York

Exhibit B

Criminal Complaint

CRIMINAL COURT OF THE CITY OF NEW YORK
PART APAR, COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

V.

CHARLES Saldarriaga (37Y)

DEFENDANT

STATE OF NEW YORK
COUNTY OF QUEENS

DETECTIVE ERIC BOLGER OF DOCUMENT FRAUD SQUAD, TAX REG#: [REDACTED] BEING DULY SWORN, DEPOSES AND SAYS THAT ON OR ABOUT MARCH 27 2024 BETWEEN 1:43PM AND 2:03PM, IN FRONT OF 28-19 STEINWAY STREET, COUNTY OF QUEENS, STATE OF NEW YORK, THE DEFENDANT COMMITTED THE OFFENSE OF:

PL 170.20 [AM] CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE THIRD DEGREE (3 COUNTS)

PL 170.20 [AM] CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE THIRD DEGREE (3 COUNTS)

--- WITH INTENT TO DEFRAUD, DECEIVE OR INJURE ANOTHER, UTTER OR POSSESS A FORGED INSTRUMENT KNOWING IT WAS FORGED.

THE ABOVE OFFENSE WAS COMMITTED AS FOLLOWS:

DEPONENT STATES THAT HE IS INFORMED BY SERGEANT WILLIAM PLANETA OF THE DOCUMENT FRAUD SQUAD TAX REG # [REDACTED] THAT AT THE ABOVE MENTIONED DATE, TIME, AND PLACE OF OCCURRENCE, HE OBSERVED THE DEFENDANT, CHARLES Saldarriaga, OPERATING A GREEN RANGE ROVER MOTOR VEHICLE BEARING FORGED REAR AND FRONT NEW YORK LICENSE PLATE NUMBER FOREV3R5.

DEPONENT STATES THAT THE DEFENDANT STATED IN SUM AND SUBSTANCE, I BOUGHT THE PLATES FROM THE DMV, I OWN THE VEHICLE.

DEPONENT STATES THAT HE EXAMINED THE ABOVE MENTIONED NEW YORK LICENSE PLATE NUMBER FOREV3R5 AND HIS CONCLUSION THAT SAID NEW YORK LICENSE PLATE IS FORGED IS BASED UPON HIS TRAINING IN THE DETECTION AND IDENTIFICATION OF FORGED INSTRUMENTS, AND THAT THE ABOVE MENTIONED FORGED NEW YORK LICENSE PLATE BACKGROUND IS BLACK IN COLOR, WHEREAS AN AUTHENTIC NEW YORK STATE LICENSE PLATE BACKGROUND WOULD NOT BE BLACK IN COLOR, AND THAT THE ABOVE MENTIONED FORGED NEW YORK LICENSE PLATE MOUNTING HOLES ARE CIRCULAR, WHEREAS AN AUTHENTIC NEW YORK LICENSE PLATE WOULD HAVE OBLONG MOUNTING HOLES, AND THAT THE LETTERING ON THE ABOVE MENTIONED FORGED NEW YORK LICENSE PLATE NUMBER IS RAISED, WHEREAS THE LETTERING ON AN AUTHENTIC NEW YORK STATE LICENSE PLATE WOULD BE FLAT.

[REDACTED]

SALDARRIAGA, CHARLES [REDACTED]

DEPONENT FURTHER STATED THAT HE RECOVERED A POLICE BRONX DISTRICT ATTORNEY PARKING PLAQUE NUMBER [REDACTED] FROM THE ABOVE MENTIONED MOTOR VEHICLE'S GLOVE COMPARTMENT.

DEPONENT STATES THAT HE IS INFORMED BY DISTRICT ATTORNEY INVESTIGATOR JOHN RILEY THAT THE ABOVE MENTIONED POLICE BRONX DISTRICT ATTORNEY PARKING PLAQUE NUMBER [REDACTED] IS FORGED AND THAT HIS CONCLUSION THAT SAID PARKING PLAQUE IS FORGED IS BASED UPON HIS OBSERVATIONS THAT SAID POLICE BRONX DISTRICT ATTORNEY PARKING PLAQUE NUMBER [REDACTED] IS NOT A VALID OR ISSUED PLAQUE NUMBER, AND THAT THE LAST TWO DIGITS OF THE YEAR A PARKING PLAQUE WAS ISSUED SHOULD BE IN FRONT OF THE PARKING PLAQUE NUMBER, AND THAT THE DEFENDANT, CHARLES SALDARRIAGA, IS NOT A CURRENT EMPLOYEE OF THE BRONX DISTRICT ATTORNEY'S OFFICE.

FALSE STATEMENTS MADE IN THIS DOCUMENT ARE
PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT
TO SECTION 210.45 OF THE PENAL LAW

3/28/2024 [Signature] 1034 #680
DATE SIGNATURE

SWORN TO BEFORE ME ON THE
DAY OF

DATE SIGNATURE

*** Filed ***
09:36 AM, 24 Sep, 2025
U.S.D.C., Eastern District of New York

Exhibit C

e Justice Report



Property » Registration IT Security Incident Report
Feedback [+]

Registration

Inquiry

Results

Search
Criteria

Plate Type: 11 Plate: FOREV3R5

DMV
Registration

Status: VALID Expiration: 10/03/2024 Plate Issued: 10/28/2022

Plate: FOREV3R5 Class: SRF - Passenger Plate, Special Registration Fee (011)

Style: X Logo: EXCELSIOR Legend: PERSONALIZED

Vehicle: 2020; LAND ROVER; RANGE ROVER; SUBURBAN; WHITE

Unladen Weight: 3935

Vehicle ID: [REDACTED] 046451

Sticker Number: 34900073 Expiration: 11/30/2024

Station ID: 7124495 Inspection Date: 11/15/2023

Reg Plate: FOREV3R5 Reg Expiration Date: 10/03/2024 Class: SPECIAL
REGISTRATION
FEE Odometer: 69544

Inspection Status: VALID

Inspection Station Name: ALISSON;REPAIR;SHOP

Inspection Station Address: 97-37 CHRISTIE AVE County: QUEE
CORONA, New York 11368

Transaction ID: 1e4c06cc-ec7d-11ee-8562-292929291919

Insurance Co.: GEICO GEN INS CO Insurance Code: 639 Policy ID: [REDACTED] 6517

Name: SALDARRIAGA, [REDACTED] Birth Date: [REDACTED] Sex: M

Address: [REDACTED]
EAST ELMHURST, New York 11370

Motorist ID: [REDACTED] 7888

Registration Suspension History

Violation Code: INSURANCE NOT IN EFFECT Order Number: C211189 Case Number: T221004

Effective Date: 12/02/2022 Compliance Code: CIVIL PENALTY Status: CLOSED

Registration Detail History

Activity: PLATES ISSUED (42)

Date: 10/28/2022 Expiration: 10/03/2024 Batch Number: 2102820CDA

Vehicle: 2020; LAND ROVER; SUBURBAN; WHITE; 4 cylinders

Vehicle ID: [REDACTED] 046451

Activity: REGISTRATION ORIGINAL (10)

Date: 10/04/2022 Expiration: 10/03/2024 Batch Number: 21004202A7

Vehicle: 2020; LAND ROVER; SUBURBAN; WHITE; 4 cylinders

Vehicle ID: [REDACTED] 046451

(less) (print preview)

Drivers License Inquiry

NICB
Vehicle

** NOTICE **

THE NICB PROVIDES THE INFORMATION CONTAINED HEREIN SOLELY
AS AN INVESTIGATORY AID. SINCE THESE RECORDS ARE NOT
VALIDATED, THE NICB DOES NOT GUARANTEE OR WARRANT THEIR
LEGITIMACY. PLEASE USE SECONDARY VERIFICATION BEFORE YOU
TAKE ANY ENFORCEMENT ACTION.

NICB RESPONSE FOR VIN/[REDACTED] 046451 MSG 01 OF 01

NO RECORD NICB

NYS Vehicle No hit

NCIC Vehicle	No hit (more) (print preview)	
NYS Plate	No hit	
NCIC Plate	No hit (more) (print preview)	
NYS Part	No hit	
NYS Parole	No hit	
NYS Probation	No hit	
NYS Order of Protection	No hit	
NYS / NCIC Person (NAM)	NYS Person Response No hit	
	NCIC Person Response ***HIT*** PROTECTION ORDER - CAUTION (more) (print preview)	Hit Confirmation Request
NYS Person (REG)	No hit	
NYS Person (VIN)	No hit	
Transaction ID: 1615d2b9-ec7d-11ee-8562-292929291919		

*** Filed ***
09:37 AM, 24 Sep, 2025
U.S.D.C., Eastern District of New York

Exhibit D

DMV Receipt

Confirmation - DMV Transaction Completed

From: NYS DMV (noreply@dmv.ny.gov)

To: CHARLESNY09@YAHOO.COM

Date: Friday, October 28, 2022 at 10:55 AM EDT

**** Do not reply to this email. You will not receive a response. ****

YOU CANNOT CANCEL THIS TRANSACTION.

INFORMATION ABOUT YOUR TRANSACTION:

ORDER CUSTOM/PERSONALIZED PLATES PROCESSED

Transaction: NYS DMV – Order Custom/Personalized Plates

Old Plate: KAA6308 **Class:** PAS

New Plate: FOREV3R5 **Class:** SRF

Credit Card Purchase: VISA

Transaction Number: 08578729

Transaction Processing Date: 10/28/2022

Terminal: CDA

The amount of \$ 60.00 was charged to your card that ends with the numbers 0514.

Card Holder: CHARLES

Auth Code: 03769D **AVS:** Y

You will receive your documents by mail. Your new plates will be mailed separately. Allow six weeks for delivery of your plates. You will also receive Instructions on what to do with your old plates and registration.

Please note that your new registration receipt and window sticker will not show blank spaces and/or the state image (if applicable). The spaces and image do appear on your plates.

A message from DMV:

We hope you are satisfied with DMV's online services. Please visit us again and remember to tell a friend!

In addition to online services, the DMV website at <https://dmv.ny.gov> has helpful information, forms, publications, and important safety advice. We want to bring you the best in online services and information.

...2020 LAND ROVER

Plate: Excelsior Vehicle Plate Number is
forev3r5

Registration Class: SRF

Registrant: Saldarriaga [REDACTED]

Mailing Address: [REDACTED]
EAST ELMHURST, NY 11370

County of Residence: QUEENS

Registration: Expires: 10/03/2024
Too Early for Renewal

Plate Mailing Status: Manufactured and ready for mailing.
Plate(s) with this number were
manufactured on 11/09/2022.

If you ordered new standard number
Excelsior plates to replace Empire
Gold or Empire Blue plates, allow six
weeks to receive your plates in the
mail.

If you ordered Excelsior plates that
have the same number as your
current plates, or you ordered
custom picture plates or
personalized plates, you will receive
your new registration documents in
the mail and allow six weeks to
receive your plates in the mail.

Inspection: Expires: 11/30/2024

Vehicle Identification Number: [REDACTED] 046451

Vehicle year: 2020
Vehicle make: LAND ROVER
Vehicle model: RRV
Color: WH
Body type: SUBN
Fuel type: G
Number of cylinders: 4
Weight: 3935

Ownership-Title

Your proof of ownership document is your New York State vehicle title certificate. (See a [sample title](#))
Select 'Check title information' to see

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U.S.D.C., Eastern District of New York

Exhibit E

Arraignment Report

SALDARRIAGA, CHARLES

MALE/ WHITE HISPANIC/ 37



NYSID :
Fax Num : QO010696
Court Part : APAR1
Docket Num :

Arrest Precinct : 114

Arrest Officer : BOLGER, ERIC
AO Command : 217
AO TaxId :
AO Rank : DT3
AO Dept : N.Y. POLICE DEPT

Status :
Current Lodging : FEEDER PEN (QCF)
Top Charge : PL 170.25
Notes On File ? YES

Custody Time : 27 hrs 36 mins
Arraignment Time : 20 hrs 46 mins

ARREST 03/27/20241403	RECORD CREATE 03/27/20241628	NYSID 03/27/20241649	DNA BANNER 03/27/20241649
PAPERWORK READY- 03/27/20242346	AO RELEASE 03/28/20241030	COMPLAINT SWORN- FAX 03/28/20241030	COMPLAINT RECEIVED 03/28/20241139
BREAKDOWN 03/28/20241141	PACKAGE TO COURT 03/28/20241151	DOCKETED 03/28/20241213	ARRAIGNMENT CLOSED 03/28/20241739
FOLDER SENT TO DA 03/27/20242346	FOLDER SENT TO DA 03/27/20242353	ROR * 03/28/20241739	

Arraignment Status

Activity Name	StartDate/Time	EndDate/Time
ARREST	03/27/20241403	- -----
RECORD CREATE	03/27/20241628	- -----
NYSID	03/27/20241649	- -----
DNA BANNER	03/27/20241649	- 03/27/20241649
PAPERWORK READY	03/27/20242346	- -----
AO RELEASE	03/28/20241030	- -----
COMPLAINT SWORN	03/28/20241030	- -----
COMPLAINT RECEIVED	03/28/20241139	- -----
BREAKDOWN	03/28/20241141	- -----
PACKAGE TO COURT	03/28/20241151	- -----
DOCKETED	03/28/20241213	- -----
ARRAIGNMENT CLOSED	03/28/20241739	- -----
FOLDER SENT TO DA	03/27/20242346	- -----
FOLDER SENT TO DA	03/27/20242353	- -----
ROR*	03/28/20241739	- -----

Lodging Status/History

Lodging Name
114 PRECINCT
PRISONER INTAKE (QIN)
MALE HOLDING
QUEENS HOSPITAL CENTER ER
PRISONER INTAKE (QIN)
MALE HOLDING
FEEDER PEN (QCF)

StartDate/Time	EndDate/Time
03/27/20241403	- 03/27/20242158
03/27/20242158	- 03/27/20242223
03/27/20242223	- 03/28/20240138
03/28/20240138	- 03/28/20240828
03/28/20240828	- 03/28/20240946
03/28/20240946	- 03/28/20241209
03/28/20241209	- -----

Charges

Law Code	Category	Charge Class	Degree
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Grouped Arrests

Arrest Id	Arrest Date	NYSID	Defendant	AO NAME
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Grouped by NYSID

Arrest Id	Arrest Date	NYSID	Defendant	AO NAME
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Notes

SALDARRIAGA, CHARLES

MALE/ WHITE HISPANIC/ 37



Date	Time	Officer Cmd.	Officer Rank	Officer Last Name	Officer First Name	Note
03/27/2024	2140	585	SGT	LUGO	RAFAEL	CASE NOT YET ASSIGNED
03/27/2024	2158	585	PO	OSIPOWICH	BRIAN	ZOLPA SHOWS ONE ARREST AT THIS TIME
03/27/2024	2306	585	SGT	VEGA	JOHN	CASE WILL BE ASSIGNED TO AN ADA IN THE MORNING
03/28/2024	0139	585	LT	GOSTA	GEORGE	DEFT LEFT IN GOOD MENTAL AND PHYSICAL CONDITION. CHEST PAIN PO COSTILLO T# [REDACTED] PO STUKES T# [REDACTED] RMP# 4063
03/28/2024	0759	585	PO	GRANT	TRAVIS	AS PER 114 DESK SGT. FRANCO, DEFT REMAINS HOSPITLAIZED AND WILL BE DISCHARGED SHORTLY.
03/28/2024	0828	585	PO	GUARDADO	DAX	AT THIS TIME ZOLPA CHECK SHOWS DEFT HAS 1 ARREST NUMBER .
03/28/2024	0906	585	SGT	OSPINA	DANNY	CASE ASSIGNED TO JACKSON 0715 HRS.
03/28/2024	1739	585	PO	BATISTA	EDWARD	DEFT IS ROR ON THIS CASE

*** Filed ***
09:37 AM, 24 Sep, 2025
U.S.D.C., Eastern District of New York

Exhibit F

Certificate of Disposition



QUEENS CRIMINAL COURT

125-01 Queens Boulevard, Kew Gardens, NY 11415

Phone: (718) 298-0792 Fax: (718) 520-2451

Court ORI: NY040033J

FEE
Non-Public
Version

The People of the State of New York

vs.

Charles Saldarriaga

Certificate of Disposition

Docket Number: [REDACTED]

CJTN:

70653306H

NYSID:

[REDACTED]

Defendant DOB: [REDACTED]

Arrest Date: 03/27/2024

Arraignment Date: 03/28/2024

THIS IS TO CERTIFY that the undersigned has examined the files of the **Queens Criminal Court** concerning the above entitled matter and finds the following:

Count #	Charge	Charge Weight	Disposition	Disposition Date
1-3	PL 170.20 AM Possess Forged Instrument-3rd **SEALED 160.50**	AM	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	07/16/2024

Charge Weight Key: I=Infraction; V=Violation; AM, BM=Class Misdemeanor; UM=Unclassified Misdemeanor; AF, BF, CF, DF, EF=Class Felony

Dated: **July 16, 2024**

R. Snyder
Chief Clerk/Clerk of the Court

CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT SEAL

All marijuana convictions under PL 221.05, PL 221.10, PL 221.15, PL 221.20, PL 221.35 or PL 221.40—including any appearing on this certificate of disposition—are vacated, dismissed, sealed, and expunged. It is an unlawful discriminatory practice for any entity to make any inquiry about such an expunged conviction or to use such an expunged conviction adversely against an individual in any form of application or otherwise—unless specifically required or permitted to do so by statute. It shall be an unlawful discriminatory practice, unless specifically required or permitted by statute, for any person, agency, bureau, corporation or association, including the state and any political subdivision thereof, to make any inquiry about, whether in any form of application or otherwise, or to act upon adversely to the individual involved, any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55, 170.56, 210.46, 210.47, or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.59 or 160.58 of the criminal procedure law, in connection with the licensing, housing, employment, including volunteer positions, or providing of credit or insurance to such individual; provided, further, that no person shall be required to divulge information pertaining to any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. An individual required or requested to provide information in violation of this subdivision may respond as if the arrest, criminal accusation, or disposition of such arrest or criminal accusation did not occur. The provisions of this subdivision shall not apply to the licensing activities of governmental bodies in relation to the regulation of guns, firearms and other deadly weapons or in relation to an application for employment as a police officer or peace officer as those terms are defined in subdivisions thirty-three and thirty-four of section 1.20 of the criminal procedure law; provided further that the provisions of this subdivision shall not apply to an application for employment or membership in any law enforcement agency with respect to any arrest or criminal accusation which was followed by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. For purposes of this subdivision, an action which has been adjourned in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, shall not be considered a pending action, unless the order to adjourn in contemplation of dismissal is revoked and the case is restored to the calendar for further prosecution. [Executive Law 296(16)]

Charges may not be the same as the original arrest charges.

CPL 160.50: All official records (excluding published court decisions or opinions or records and briefs on appeal) related to the arrest or prosecution on file with the Division of Criminal Justice Services, any court, police agency or prosecutor's office shall not be available to any person or public or private agency.